

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MICHIGAN CUSTOM MACHINES, INC.,

Plaintiff,

v.

AIT WORLDWIDE LOGISTICS, INC. and
JP GRAHAM TRANSPORT, INC.,

Case No. 2:20-cv-11644
Hon. Laurie J. Michelson
Mag. R. Steven Whalen

Defendants.

**DEFENDANT JP GRAHAM TRANSPORT, INC.'S UNOPPOSED
MOTION FOR AN EXTENSION OF TIME TO FILE AN ANSWER OR TO
OTHERWISE PLEAD**

Defendant, JP GRAHAM TRANSPORT, INC. ("JP Graham"), by and through its undersigned counsel, respectfully requests, states and prays as follows:

1. On June 23, 2020, Plaintiff, Michigan Custom Machines, Inc. filed a Complaint in the above-captioned action. *See* Docket No. 1.

2. The Complaint was served on JP Graham on July 14, 2020.

3. Pursuant to Fed. R. Civ. P. 12(a), JP Graham had until August 4, 2020 to file a response to Plaintiff's Complaint.

4. The undersigned counsel was not retained by JP Graham until August 12, 2020, making the filing of a timely response impossible. As soon as the undersigned began the representation, she formally appeared and then notified

Plaintiff's counsel of the representation and made the request for an extension of time to file an answer or otherwise respond. Plaintiff's counsel consented to this request and agreed to a deadline of August 25, 2020.

5. The foregoing request is made in good faith, not for the purpose of delay and with the purpose of allowing the undersigned counsel to fulfill in a responsible manner its duties to JP Graham and to this Honorable Court.

WHEREFORE, Defendant, JP Graham Transport, Inc., respectfully requests that this Honorable Court grant its request for an extension of the time by which it must Answer or otherwise plead in response to Plaintiff's Complaint, and give Defendant until August 25, 2020 to take such action.

Respectfully submitted,

Dated: August 14, 2020

/s/ Kristen M.J. Johnson
Kristen M.J. Johnson, Esq.
TAYLOR & ASSOCIATES,
ATTORNEYS AT LAW, P.L.
20 3rd Street SW, Suite 209
Winter Haven, FL 33880
(863) 875-6950 (tel)
(863)875-6955 (fax)
kjohnson@taylorlawpl.com
efiling@taylorlawpl.com
lroberts@taylorlawpl.com

Counsel for Defendant JP Graham

Adam C. Zwicker (P73672)
GALLAGHER SHARP LLP
211 W. Fort St., Ste. 660

Detroit, MI 48226
(313) 962-9160 / 9167 Fax
azwicker@gallaghersharp.com

*Local Rule 83.20 Counsel for
Defendant JP Graham*

CERTIFICATE OF SERVICE

This is to certify that on August 14, 2020, the forgoing document was filed with the Clerk of Court using the CM/ECF System. Notice will be sent to all counsel of record and/or parties by operation of the Court's electronic case filing system. Parties may access this through the Court's electronic case filing system.

/s/ Kristen M.J. Johnson